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Frontier Airlines, Inc.; Gateway Frontline Services,  
Inc.; Gateway Group One, Inc; Daniel Blaise; Jordan  
Orphan;  
and Diamond Barrier

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DIANE FLOOD, an individual,  
Plaintiff,

vs.

FRONTIER AIRLINES, INC., a foreign  
corporation; GATEWAY FRONTLINE  
SERVICES, INC. a foreign corporation;  
GATEWAY GROUP ONE, INC. a  
foreign corporation; DANIEL BLAISE,  
an individual; JORDAN ORPHAN, an  
individual; DIAMOND BARRIER, an  
individual, DOES 1 through 20, inclusive,  
and ROE BUSINESS ENTITIES 1  
through 20, inclusive,  
Defendant.

Case No. 2:21-cv-00717

**DEFENDANTS' NOTICE OF  
REMOVAL OF ACTION TO THE  
UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
NEVADA**

**TO: THE UNITED STATES DISTRICT COURT FOR DISTRICT OF  
NEVADA:**

Please take notice that Defendants: Frontier Airlines, Inc.; Gateway Frontline  
Gateway Group One, Inc.; and Diamond Barrier (hereinafter "Defendants"), submits

1 this Notice of Removal to the United States District Court for the District of Nevada.

2 PLEASE TAKE NOTICE that DEFENDANTS hereby remove the state action  
 3 entitled "DIANE FLOOD, individually vs. FRONTIER AIRLINES, INC. ET AL.,"  
 4 Case No. A-21-831964-C filed in the Eighth Judicial District Court for the State of  
 5 Nevada in and for the County of Clark to this Court. The grounds for removal are as  
 6 follows:

7 1. Plaintiff filed her Complaint on March 29, 2021, against Defendants Frontier  
 8 Airlines, Inc.; Gateway Frontline Services, Inc.; Gateway Group One, Inc.;  
 9 Daniel Blaise; Jordan Orphan; and Diamond Barrier.

10 2. Removal is appropriate pursuant to 28 U.S.C. §1441(b) because there is  
 11 diversity of citizenship, sufficient to justify removal. Plaintiff Diane Flood was  
 12 a citizen of the State of Nevada at the time of the incident as she was moving  
 13 from Milwaukee, Wisconsin to Las Vegas, Nevada for medical treatment. In  
 14 addition, Defendant Diamond Barrier is and was a citizen of the State of  
 15 Georgia. Further, the three entity Defendants are citizens of the States of  
 16 Colorado or New Jersey. As such, there is now and there was at the time of the  
 17 commencement of this action complete diversity between Plaintiff and served  
 18 Defendants.

19 3. Service of the Summons and Complaint upon Defendants were made on the  
 20 dates as follows:

21 Frontier Airlines, Inc.	March 31, 2021
22 Gateway Frontline Services, Inc.	April 14, 2021
23 Gateway Group One, Inc.	March 30, 2021
24 Daniel Blaise	Pending
25 Jordan Orphan	Pending
26 Diamond Barrier	April 2, 2021

27 4. Defendants have not filed an Answer.

28 5. No further proceedings have been had in this matter in the Eighth Judicial

District Court, Clark County, State of Nevada.

6. Pursuant to 28 U.S.C. §1446(b), Defendants provide this Court with copies of the following documents:

a. Complaint, attached hereto as **Exhibit A**.

7. The sum of the damages alleged by Plaintiff necessarily exceeds \$75,000.00, exclusive of interest and costs, based on the following facts: Plaintiff is claiming an excess of \$194,000.00 in past and future medical specials as of December 9, 2019 based on her pre-litigation demand.

8. This Court has original jurisdiction over the subject matter of this action under the provisions of Section 1332 of Title 28 of the United States Code in that there is complete diversity between the parties and more than \$75,000.00 in controversy exclusive of interest and costs. Pursuant to Section 1441 of Title 28 of the United States Code, Defendants are therefore entitled to remove this action to this Court.

9. Thirty days have not elapsed since the first served Defendant, Frontier Airlines, Inc. was served with the summons and complaint in this action on March 31, 2021.

10. A true and correct copy of this Notice of Removal is being filed this date with the Clerk of the Eighth Judicial District Court, Clark County, State of Nevada.

Dated: April 30, 2021

BREMER WHYTE BROWN & O'MEARA  
LLP

By: 

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Frontline Services, Inc., Gateway  
Group One, Inc., Daniel Blaise,  
Jordan Orphan, Diamond Barrier*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of April 2021, a true and correct copy of the foregoing document was electronically delivered to CM/ECF for filing and service upon all electronic service list recipients.



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Shannon Formont, an employee of  
BREMER WHYTE BROWN &  
O'MEARA, LLP